

Exhibit 2



ROGER BALDWIN FOUNDATION
OF ACLU, INC.

Illinois

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July 3, 2025

Via Email

Michael Sheehan, Allan Slagel, Barton O'Brien, Elizabeth Winkowski
Sara J. Schroeder, T. Hudson Cross IV, and Joan Ahn
Taft Stettinius & Hollister LLP
111 E. Wacker Dr. Suite 2600
Chicago, IL 60601

Re: Deposition Scheduling in *Wilkins v. City of Chicago*, No. 23-cv-4072

Dear Counsel,

Please find our preliminary list of witnesses to depose below, and Notices of Deposition attached with this letter. Plaintiffs reserve the right to supplement this list with additional witnesses as our investigation continues and the City completes its ESI production.

We have chosen tentative dates in September, October, and November for each witness and we look forward to conferring with the City in the upcoming weeks to set final dates. To the extent the witnesses' and counsels' schedules permit, Plaintiffs intend to take these depositions in the following order:

September Depositions

| Witness | Proposed Date |
|--------------------|----------------------|
| Charles Harris II | September 2, 2025 |
| Humberto Rabdaban | September 3, 2025 |
| John J. Pietryla | September 5, 2025 |
| Michael Donnelly | September 8, 2025 |
| David L. Waite | September 10, 2025 |
| Nicholas Prozanski | September 11, 2025 |
| David McNaughton | September 15, 2025 |
| Steven Caluris | September 17, 2025 |
| James Roussell | September 18, 2025 |
| Noe Flores | September 19, 2025 |
| Janey Rountree | September 22, 2025 |
| Garry McCarthy | September 23, 2025 |
| Larry Watson | September 25, 2025 |
| Lewis Courts | September 29, 2025 |
| Davina Ward | September 30, 2025 |

October Depositions

| Witness | Proposed Date |
|----------------|----------------------|
| Barbara West | October 1, 2025 |
| Stephen Chung | October 3, 2025 |
| Walter Katz | October 7, 2025 |
| Fred Waller | October 8, 2025 |
| John Escalante | October 10, 2025 |
| Kevin Navarro | October 14, 2025 |
| Anthony Riccio | October 15, 2025 |
| Eddie Johnson | October 17, 2025 |
| Charlie Beck | October 20, 2025 |
| Fred Melean | October 22, 2025 |
| Patrica Wines | October 24, 2025 |
| Kevin Ryan | October 29, 2025 |

November Depositions

| Witness | Proposed Date |
|-----------------|----------------------|
| Brian McDermott | November 3, 2025 |
| Robert Boik | November 5, 2025 |
| David Brown | November 6, 2025 |
| Eric Carter | November 7, 2025 |
| William Bradley | November 10, 2025 |
| Rahm Emanuel | November 11, 2025 |
| Susan Lee | November 13, 2025 |
| Lori Lightfoot | November 14, 2025 |
| Garien Gatewood | November 17, 2025 |
| Yolanda Talley | November 18, 2025 |
| Larry Snelling | November 20, 2025 |
| Brandon Johnson | November 21, 2025 |

Please notify us as soon as possible if the City is unable to locate or does not represent any of the listed witnesses. For any such witnesses, please provide the last known contact information for the witness or contact information for their counsel. Thank you in advance for your cooperation.

Sincerely,

/s/ Joseph DiCola

Joseph DiCola

cc: All counsel